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BY ECF

April 16, 2025

Honorable Arun Subramanian United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Avraham Eisenberg</u>

23 Cr. 10 (AS)

Dear Judge Subramanian:

We provide this supplemental sentencing submission on behalf of Avraham Eisenberg. Attached as Exhibit A is the Mango Markets Transaction Summary Report prepared by defense expert Jeremy Sheridan of FTI Consulting, which, among other things, concludes on the basis of a detailed analysis of transaction logs, which are attached as exhibits, that Mr. Eisenberg's withdrawals of 50 million USDC and 2.8 million USDC from the Mango Markets platform on October 11, 2022 were withdrawals of profits and not borrows as the government has alleged. These conclusions provide further support for the arguments discussed on pages 48-51 (regarding objections to Paragraph 17 of the Presentencing Report ("PSR")), pages 57-58 (regarding objections to Paragraph 36 of the PSR), pages 59-60 (regarding objections to Paragraph 69 of the PSR and the government's purported loss amount) of Mr. Eisenberg's sentencing memorandum (Dkt. 200).

Also, attached collectively as Exhibit B are two additional letters of support, which were received after Mr. Eisenberg filed his sentencing memorandum.

Thank you for Your Honor's consideration of this letter.

Respectfully submitted,

Sanford N. Talkin

Noam B. Greenspan

Sanford N. Talkin

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-and-

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cc: all counsel of record (by ECF)